

January 10, 2002

Mr. Daniel Moore
Industrial Steel Construction, Inc.
86 North Bridge Street
Gary, Indiana 46404

Re: **089-14370**
First Significant Revision to
FESOP F 089-5330-00161

Dear Mr. Moore:

Industrial Steel Construction, Inc. was issued a permit on July 5, 2000 for a miscellaneous metal working and bridge beam fabrication source. A letter requesting changes to this permit was received on May 10, 2001. Pursuant to the provisions of 326 IAC 2-8-11.1(f)(1), a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of changes the throughput limits for the two (2) plate sweep grinders, identified as EU #11, installed in 1990, the two (2) slab grinders, identified as EU #11, installed in 1991 and the one (1) paint booth, identified as EU #15, installed in 1977. In addition, the modification consists of adding one (1) paint booth, known as EU#20, equipped with HVLP applicators and dry filters for PM overspray and a natural gas-fired regenerative thermal oxidizer as well as a mechanical blaster and two (2) natural gas fired ovens

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit

revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark L. Kramer, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

MLK/MES

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Gary Air and Land Pollution Control
Air Compliance Section Inspector - Rick Massoels
Compliance Branch - Mendy Jones
Administrative and Development - Cynthia Bymaster
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY
and Gary Air and Land Pollution Control**

**Industrial Steel Construction, Inc.
86 North Bridge Street
Gary, Indiana 46404**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

| | |
|--|--|
| Operation Permit No.: F 089-5330-00161 | |
| Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: July 5, 2000 Expiration Date: July 5, 2005 |

First Reopening No.: R 089-13068-00161, issued September 24, 2001

| | |
|--|--|
| First Significant Permit Revision: F 089-14370-00161 | Conditions Affected: A.2, A.3, B.10, B.11, D.1.1 Section D.1 & Sections D.2 & D.3 added |
| Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality | Issuance Date: January 10, 2002 |

TABLE OF CONTENTS

| | | |
|------------------|---|-----------|
| SECTION A | SOURCE SUMMARY | 5 |
| A.1 | General Information [326 IAC 2-8-3(b)] | |
| A.2 | Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)] | |
| A.3 | Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)] | |
| A.4 | FESOP Applicability [326 IAC 2-8-2] | |
| SECTION B | GENERAL CONDITIONS | 9 |
| B.1 | Permit No Defense [IC 13] | |
| B.2 | Definitions [326 IAC 2-8-1] | |
| B.3 | Permit Term [326 IAC 2-8-4(2)] | |
| B.4 | Enforceability [326 IAC 2-8-6] | |
| B.5 | Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)] | |
| B.6 | Severability [326 IAC 2-8-4(4)] | |
| B.7 | Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)] | |
| B.8 | Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] | |
| B.9 | Compliance Order Issuance [326 IAC 2-8-5(b)] | |
| B.10 | Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)] | |
| B.11 | Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)] | |
| B.12 | Annual Compliance Certification [326 IAC 2-8-5(a)(1)] | |
| B.13 | Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)] | |
| B.14 | Emergency Provisions [326 IAC 2-8-12] | |
| B.15 | Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)] | |
| B.16 | Permit Modification, Reopening, Revocation and Reissuance, or Termination | |
| B.17 | Permit Renewal [326 IAC 2-8-3(h)] | |
| B.18 | Permit Amendment or Modification [326 IAC 2-8-10][326 IAC 2-8-11.1] | |
| B.19 | Operational Flexibility [326 IAC 2-8-15] | |
| B.20 | Permit Revision Requirement [326 IAC 2-8-11.1] | |
| B.21 | Inspection and Entry [326 IAC 2-8-5(a)(2)] | |
| B.22 | Transfer of Ownership or Operation [326 IAC 2-8-10] | |
| B.23 | Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16] | |
| SECTION C | SOURCE OPERATION CONDITIONS | 21 |
| | Emission Limitations and Standards [326 IAC 2-8-4(1)] | |
| C.1 | Overall Source Limit [326 IAC 2-8] | |
| C.2 | Opacity [326 IAC 5-1] | |
| C.3 | Open Burning [326 IAC 4-1][IC 13-17-9] | |
| C.4 | Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)] | |
| C.5 | Fugitive Dust Emissions [326 IAC 6-4] | |
| C.6 | Fugitive Dust Emissions [326 IAC 6-1-11.1] | |
| C.7 | Operation of Equipment [326 IAC 2-8-5(a)(4)] | |
| C.8 | Stack Height [326 IAC 1-7] | |
| C.9 | Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140] | |
| | Testing Requirements [326 IAC 2-8-4(3)] | |
| C.10 | Performance Testing [326 IAC 3-6] | |
| | Compliance Requirements [326 IAC 2-1.1-11] | |
| C.11 | Compliance Requirements [326 IAC 2-1.1-11] | |
| | Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)] | |
| C.12 | Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)] | |

- C.13 Monitoring Methods [326 IAC 3]
- C.14 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]
- C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS: EU #1, 2, 9, 11, 13, 15, 17, and 18 30

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Emission Offset Minor Limit [326 IAC 2-3]
- D.1.2 Particulate Matter (PM) [326 IAC 6-1]
- D.1.3 PM₁₀ [326 IAC 2-8-4] [326 IAC 2-3]
- D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]
- D.1.7 Volatile Organic Compounds (VOC)
- D.1.8 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- D.1.9 Particulate Matter (PM)
- D.1.10 Visible Emissions Notations
- D.1.11 Parametric Monitoring
- D.1.12 Monitoring of Smoke Eliminators
- D.1.13 Baghouse Inspections
- D.1.14 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.1.15 Record Keeping Requirements
- D.1.16 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: EU#20 37

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-1-2] [326 IAC 8-2-9]
- D.2.2 Emission Offset Minor Limit [326 IAC 2-3]
- D.2.3 Regenerative Thermal Oxidizer
- D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]
- D.2.6 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.7 Parametric Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

D.2.9 Reporting Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS: EU#19 40

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.3.3 Particulate Matter (PM)

D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.5 Visible Emissions Notations

D.3.6 Parametric Monitoring

D.3.7 Baghouse Inspections

D.3.8 Broken or Failed Bag Detection

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.9 Record Keeping Requirements

SECTION D.4 FACILITY OPERATION CONDITIONS: Insignificant Activities 43

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Emission Offset Minor Limit [326 IAC 2-3]

D.4.2 Particulate Matter (PM) [326 IAC 6-1-2]

D.4.3 Organic Solvent Degreasing Operations: Open top vapor degreaser operation
[326 IAC 8-3-3]

D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC)

D.4.6 VOC Emissions

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.7 Record Keeping Requirements

D.4.8 Reporting Requirements

Certification Form 47

Emergency/Deviation Form 48

Quarterly Report Forms 50

Quarterly Compliance Monitoring Report Form 60

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Gary Air and Land Pollution Control. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a miscellaneous metal working and bridge beam fabrication source.

| | |
|-------------------------|--|
| Authorized individual: | Daniel Moore |
| Source Address: | 86 North Bridge Street, Gary, Indiana 46404 |
| Mailing Address: | 86 North Bridge Street, Gary, Indiana 46404 |
| Phone Number: | 219 - 885 - 7600 |
| SIC Code: | 3441 and 3449 |
| County Location: | Lake County |
| Source Location Status: | Severe Nonattainment for NO _x Severe Nonattainment for VOC Attainment for CO Primary Nonattainment SO _x Primary Nonattainment TSP Moderate Nonattainment PM ₁₀ |
| Source Status: | Federally Enforceable State Operating Program (FESOP) Minor Source , Under Emission Offset Rules: Section 112 of the Clean Air Act |

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The stationary source consists of the following emission units and pollution control devices:

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

- (b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 15 tons of VOC delivered to the applicators per twelve (12) consecutive month period, rolled monthly and limited to less than 7,801 gallons of paint with a density 21.3 pounds per gallon twelve (12) consecutive month period, rolled monthly.
- (d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.
- (e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.
- (g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

Grinding

- (h) Two (2) plate sweep grinders, identified as EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to 136,817 square feet of steel plates per twelve (12) consecutive month period, rolled monthly.
- (i) Two (2) slab grinders, identified as EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to 68,281 tons of steel slabs per twelve (12) consecutive month period, rolled monthly.

Paint Line

- (j) One (1) paint booth, known as EU#20, equipped with HVLP applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, known as RTO 100, rated at 1.5 million British thermal units per hour, to be installed in 2001, exhausted through Stack #10, capacity: 43,269 pounds of steel plate per hour, limited to 17,170 gallons of paint and 876 gallons of solvents per twelve (12) consecutive month period, rolled monthly.
- (k) One (1) mechanical blaster/blowoff, known as EU#19, equipped with a baghouse, exhausting through Stack #9, to be installed in 2001, capacity: 52,409 pounds of steel plate per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:
 - (1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7.
 - (2) Twenty-one (21) space heaters, identified as EU #8, rated at 2.1 million British thermal units per hour total.
 - (3) Twelve (12) down-flow heaters, identified as EU #8, rated at 0.600 million British thermal units per hour each or 7.2 million British thermal units per hour total.
 - (4) Twenty-eight (28) radiant heaters, identified as EU #8, rated at 0.175 million British thermal units per hour each or 4.9 million British thermal units per hour total.
 - (5) Four (4) preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total.
 - (6) One (1) natural gas-fired cure oven, rated at 1.4 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001.
 - (7) One (1) natural gas-fired preheat oven, rated at 2.58 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001.
- (b) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) open parts washers, identified as EU #12.

- (i) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (k) Closed loop heating and cooling systems.
- (l) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (n) Paved and unpaved roads and parking lots with public access.
- (o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (q) On-site fire and emergency response training approved by the department.
- (r) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs: Armor painting area in one (1) paint booth, identified as EU #10, exhausting to general ventilation.
- (s) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and Gary Air and Land Pollution Control, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Gary Air and Land Pollution Control.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, and Gary Air and Land Pollution Control within a reasonable time, any information that IDEM, OAQ, and Gary Air and Land Pollution Control may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, and Gary Air and Land Pollution Control, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and Gary Air and Land Pollution Control may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Gary Air and Land Pollution Control on or before the date it is due.

(c) The annual compliance certification report shall include the following:

- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and Gary Air and Land Pollution Control may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and Gary Air and Land Pollution Control upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and Gary Air and Land Pollution Control. IDEM, OAQ, and Gary Air and Land Pollution Control may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Gary Air and Land Pollution Control, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Gary Air and Land Pollution Control
Local Agency Telephone No.: 219-882-3007
Local Agency Facsimile No.: 219-882-3012

Failure to notify IDEM, OAQ and Gary Air and Land Pollution Control, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ and Gary Air and Land Pollution Control, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and Gary Air and Land Pollution Control, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

within ten (10) calendar days from the date of the discovery of the deviation. The failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or Gary Air and Land Pollution Control determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or Gary Air and Land Pollution Control, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ and Gary Air and Land Pollution Control, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and Gary Air and Land Pollution Control, may provide

a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and Gary Air and Land Pollution Control, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Gary Air and Land Pollution Control when applicable) on or before the date it is due.
- (2) If IDEM, OAQ and Gary Air and Land Pollution Control, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and Gary Air and Land Pollution Control takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and Gary Air and Land Pollution Control, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and Gary Air and Land Pollution Control, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and Gary Air and Land Pollution Control U.S. EPA, or an

authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, and Gary Air and Land Pollution Control, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

| |
|---------------|
| Entire Source |
|---------------|

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
- (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-3 (Emission Offset), emissions of particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and Gary Air and Land Pollution Control within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and Gary Air and Land Pollution Control, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (c) A verification to IDEM, OAQ, and Gary Air and Land Pollution Control that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;
- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ and Gary Air and Land Pollution Control upon request and shall be subject to review and approval by IDEM, OAQ, and Gary Air and Land Pollution Control. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
 - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.

- (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

-
- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Gary Air and Land Pollution Control on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Gary Air and Land Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Gary Air and Land Pollution Control within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Air and Land Pollution Control
Suite 1012
504 Broadway
Gary, Indiana 46402

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Gary Air and Land Pollution Control on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

- (b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 15 tons of VOC delivered to the applicators per year and limited to less than 7,801 gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, rolled monthly.
- (d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.
- (e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.
- (g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

Grinding

- (h) Two (2) plate sweep grinders, identified as EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to 136,817 square feet of steel plates per twelve (12) consecutive month period, rolled monthly.
- (i) Two (2) slab grinders, identified as EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to 68,281 tons of steel slabs per twelve (12) consecutive month period, rolled monthly.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Emission Offset Minor Limit [326 IAC 2-3]

- (a) The one (1) paint booth, identified as EU #15, shall:
- (1) Use less than fifteen (15) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the source's potential to emit VOC to less than twenty-five (25) per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
 - (2) Use less than 7,801 gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (b) The input of steel plates and shapes to the mechanical blaster, identified as EU #1 shall be limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (c) The input of steel plates and shapes to the mechanical blaster, identified as EU #2 shall be limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (d) The input of rods to the twelve (12) electric arc stick welders, identified as EU #9 shall be limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (e) The input of steel plates to the two (2) plate sweep grinders, identified as EU #11, shall be limited to 136,817 square feet of steel plates per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (f) The input of steel slabs to the two (2) slab grinders, identified as EU #11, shall be limited to 68,281 tons of steel slabs per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (g) The throughput of steel to the forty-seven (47) torches, (excluding the two (2) DB torches) identified as EU #13, shall be limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326

IAC 2-3 (Emission Offset) not applicable.

- (h) The input of wire to the twelve (12) submerged arc welding heads, identified as EU #17 shall be limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-1]

- (a) The particulate matter (PM) emissions from each of the three (3) blasters, identified as EU #1, EU #2 and EU #18, shall not exceed 0.03 grains per dry standard cubic foot for Stacks #1, #2 and #18, equivalent to:
- (1) 5.74 pounds per hour at a flow rate of 22,330 dry standard cubic feet per minute for EU #1,
 - (2) 1.57 pounds per hour at a flow rate of 6,100 dry standard cubic feet per minute for EU #2, and
 - (3) 6.43 pounds per hour at a flow rate of 25,000 dry standard cubic feet per minute for EU #18.
- (b) The particulate matter (PM) emissions from EU #9, EU #11, EU13 and EU #17, shall not exceed 0.03 grains per dry standard cubic foot. Those facilities which do not have stacks or vents and are not totally enclosed shall comply with 326 IAC 5-1 and 326 IAC 6-4 in lieu of 0.03 grains per dry standard cubic foot requirement of 326 IAC 6-1-2(a).

D.1.3 PM₁₀ [326 IAC 2-8-4] [326 IAC 2-3]

- (a) Pursuant to 326 IAC 2-8-4, the individual emissions units shall not exceed the following hourly PM₁₀ emission limits and PM₁₀ emission factors:

| Process | Hourly PM ₁₀ Emission Limit (pounds per hour) |
|--------------------|---|
| EU #1, Blaster #1 | 5.74 |
| EU #2, Blaster #2 | 1.57 |
| EU #18, Blaster #3 | 3.21 |

| Process | PM ₁₀ Emission Factor (pounds of PM ₁₀ per 1,000 pounds of rods consumed) |
|-------------------------|---|
| EU #9, 12 Stick Welders | 18.4 |

| Process | PM ₁₀ Emission Factor (pounds of PM ₁₀ per square foot of plate swept) |
|--------------------------|--|
| EU #11, 2 Sweep Grinders | 18.4 |

| Process | PM ₁₀ Emission Factor (pounds of PM ₁₀ per pound of slab ground) |
|-------------------------|--|
| EU #11, 2 Slab Grinders | 0.000493 |

| Process | PM ₁₀ Emission Factor (pounds of PM ₁₀ per 1,000 inches of one (1) inch thick steel cut) |
|----------------------------|---|
| EU #13, 49 Cutting Torches | 0.0815 |

| Process | PM ₁₀ Emission Factors (pounds of PM ₁₀ per pound of wire consumed) |
|-------------------------------------|---|
| EU #17, 12 Submerged Arc Welders | 0.036 |

- (b) Compliance with these PM₁₀ emission limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) and 326 IAC 2-3 do not apply.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coatings delivered to the applicators in EU #15 metal coating operations shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings computed on a daily volume weighted basis. The daily volume weighted average of VOC content shall be calculated only when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water using the following formula, where n is the number of coatings (c):

$$\frac{c = n}{3 \text{ coating } c \text{ (gal)} \times \text{VOC content of } c \text{ (lbs/gal, less water)}} \\ c = 1$$

- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU #1, EU #2, EU #9, EU #11, EU #13, EU #15 and EU #17 and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM₁₀ testing of EU #1, #2 and #18 (blasters #1, #2 and #3) utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM₁₀, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1(a) and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ and Gary Air and Land Pollution Control reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.1(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.9 Particulate Matter (PM)

- (a) The baghouses for PM control shall be in operation and control emissions from the EU #1, EU #2 and EU #18 (blasters #1, #2 and #3) at all times that the blasting processes are in operation.
- (b) The smoke eliminators associated with the two (2) DB torches in EU #13 shall be in operation at all times that the DB torches are in operation.

D.1.10 Visible Emissions Notations

- (a) Daily visible emission notations of the blaster stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Daily visible emission notations of the DB torches smoke eliminator exhausts in EU #13 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the blasting processes, at least once per shift when the blasting processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses for blasters #1 and #2 shall be maintained within the range of 2.0 and 6.0 inches of water and within the range of 1.0 and 4.0 inches of water for blaster #3 or a range established during the latest stack tests. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure readings are outside of the above mentioned ranges for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and Gary Division Air Pollution Control and shall be calibrated at least once every six (6) months.

D.1.12 Monitoring of Smoke Eliminators

Daily inspections shall be performed to verify the placement and integrity of the smoke eliminators associated with the two (2) DB torches in EU #13. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.13 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the blasting operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.14 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.15 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a) and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Conditions D.1.1(a) and D.1.4.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day, if necessary;
 - (4) The cleanup solvent usage for month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the three (3) blaster stack exhausts and the two (2) DB torch smoke eliminator exhausts.
- (c) To document compliance with Condition D.1.11, the Permittee shall maintain the following:
- (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (d) To document compliance with Condition D.1.13, the Permittee shall maintain records of the results of the inspections required under Condition D.1.13 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) through D.1.1(i) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Paint Booth, known as EU#20

- (j) One (1) paint booth, known as EU#20, equipped with HVLP applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, known as RTO 100, rated at 1.5 million British thermal units per hour, to be installed in 2001, exhausted through Stack #10, capacity: 43,269 pounds of steel plate per hour, limited to 17,170 gallons of paint and 876 gallons of solvents per twelve (12) consecutive month period, rolled monthly.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-1-2] [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to HVLP paint applicators.
- (b) Based upon 326 IAC 8-1-2(c) and a minimum overall control efficiency of 69.1% (the overall control efficiency equals: (capture efficiency) x (destruction efficiency)), the VOC content of the coating shall not exceed 21.6 pounds per gallon of coating solids delivered to the applicator.
- (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.2 Emission Offset Minor Limit [326 IAC 2-3]

- (a) The coatings used in the one (1) paint booth, identified as EU #20, shall not exceed 17,170 gallons of primer delivered to the applicators with a VOC content of no more than 21.6 pounds per gallon of solids per twelve (12) consecutive month period, rolled monthly.
- (b) The solvents used in the one (1) paint booth, identified as EU #20, shall not exceed 876 gallons of solvent with a VOC content of no more than 6.93 pounds per gallon per twelve (12) consecutive month period, rolled monthly.
- (c) Compliance with these limits, equivalent to 3.86 tons of VOC per year, makes the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

D.2.3 Regenerative Thermal Oxidizer

- (a) The regenerative thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1400°F during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM.
- (b) When operating the thermal oxidizer to achieve compliance with 326 IAC 8-2-9, 3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the

applicator, the thermal oxidizer shall maintain a minimum overall control efficiency of 69.1%. These efficiencies and the use of the thermal oxidizer are required by rule 326 IAC 8-1-2(a)(2).

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

During the period between 60 and 180 days after the paint booth, EU #20, is in operation, the Permittee shall perform VOC testing to demonstrate compliance with Condition D.2.1 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range established in the most recent compliant stack test.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, D.2.2, D.2.3 and D.2.7, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2 and D.2.3 as well as the parametric monitoring requirements of Condition D.2.7.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
 - (6) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.
 - (7) Weekly records of the duct pressure or fan amperage.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Blaster/blowoff, known as EU#19

- (k) One (1) mechanical blaster/blowoff, known as EU#19, equipped with a baghouse, exhausting through Stack #9, to be installed in 2001, capacity: 52,409 pounds of steel plate per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the mechanical blaster/blowoff, known as EU#19, shall not exceed 0.03 grain per dry standard cubic foot for Stack #9, equivalent to 5.66 pounds per hour at a flow rate of 22,000 dry standard cubic feet per minute.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Particulate Matter (PM)

In order to comply with Condition D.3.1, the baghouse for PM control shall be in operation and control emissions from the mechanical blaster/blowoff, known as EU#19, at all times that the mechanical blaster/blowoff is in operation.

D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 60 and 180 days after the mechanical blaster/blowoff is in operation, in order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM and PM₁₀ testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.5 Visible Emissions Notations

- (a) Visible emission notations of the mechanical blaster/blowoff stack exhaust #9 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that

specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the mechanical blaster/blowoff process, at least once per shift when the mechanical blaster/blowoff process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the mechanical blaster/blowoff operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.3.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.9 Record Keeping Requirements

-
- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations once per shift of the mechanical blaster/blowoff stack exhaust #9.
 - (b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
 - (c) To document compliance with Condition D.3.7, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7 and the dates the vents are redirected.
 - (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: - Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:
 - One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - Four (4) open parts washers, identified as EU #12.
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (l) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (r) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs: Armor painting area in one (1) paint booth, identified as EU #10, exhausting to general ventilation.
- (s) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 Emission Offset Minor Limit [326 IAC 2-3]

- (a) The VOC delivered to the applicators in the one (1) armor painting area, identified as EU #10 and the VOC used by the four (4) open parts washers, identified as EU #12, shall be less than a total of 4.50 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the source's potential to emit VOC to less than twenty-five (25) per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-1-2]

- (a) Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the brazing equipment, cutting torches soldering equipment, welding equipment structural steel and bridge fabrication activities and hand grinding shall be limited to 0.03 grain per dry standard cubic foot.
- (b) Pursuant to 326 IAC 6-1-2(b)(5), the particulate matter emission from the 1.80 million British thermal units per hour natural gas-fired boiler, identified as EU #7, shall not exceed 0.01 grains per dry standard cubic foot of exhaust air. This emission limit also satisfies the requirements of 326 IAC 6-2-2.

D.4.3 Organic Solvent Degreasing Operations: Open top vapor degreaser operation [326 IAC 8-3-3]

The four (4) open parts washers, identified as EU #12, are subject to this rule. The owner or operator of open top vapor degreasers shall:

- (a) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;
- (b) keep the cover closed at all times except when processing work loads through the degreaser;
- (c) minimize solvent carryout by:
 - (1) racking parts to allow complete drainage;
 - (2) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);
 - (3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (4) tipping out any pools of solvent on the cleaned parts before removal; and
 - (5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;
- (d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;
- (e) not occupy more than half of the degreaser's open top area with the workload;
- (f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;
- (g) never spray above the vapor level;
- (h) repair solvent leaks immediately, or shut down the degreaser;
- (i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;
- (j) not use workplace fans near the degreaser opening;
- (k) not allow visually detectable water in the solvent exiting the water separator; and
- (l) provide a permanent, conspicuous label summarizing the operating requirements.

D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coatings delivered to the applicators in EU #10 metal coating operations shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings computed on a daily volume weighted basis. The daily volume weighted average of VOC content shall be calculated only when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water using the following formula, where n is the number of coatings (c):

$$\frac{c = n}{c = 1} \times \frac{3 \text{ coating } c \text{ (gal)} \times \text{VOC content of } c \text{ (lbs/gal, less water)}}{3 \text{ coating } c \text{ (gal)}}$$

$c = 1$

- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ and Gary Air and Land Pollution Control reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.4.6 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.7 Record Keeping Requirements

- (a) To document compliance with Conditions D.4.1 and D.4.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Conditions D.4.1 and D.4.3.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day, if necessary;
 - (4) The cleanup solvent usage for month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.8 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

and Gary Air and Land Pollution Control

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and Gary Air and Land Pollution Control

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C)
The Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

| |
|---|
| Date/Time Emergency/Deviation started: |
| Date/Time Emergency/Deviation was corrected: |
| Was the facility being properly operated at the time of the emergency/deviation? Y N Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency/deviation: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Air and Land Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #15
Parameter: VOC including coatings, dilution solvents delivered to the applicators, and cleaning solvents
Limit: Less than fifteen (15) tons per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | VOC (tons) | VOC (tons) | VOC (tons) |
|-------|------------|--------------------|----------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Air and Land Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #15
Parameter: Gallons of paint with a density of 21.3 pounds per gallon
Limit: Less than 7,801 gallons per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | Gallons of Paint | Gallons of Paint | Gallons of Paint |
|-------|------------------|--------------------|------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE SECTION
and Gary Air and Land Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Mechanical blasters #1 and #2, EU #1 and EU #2
Parameter: Input of steel plates and shapes
Limits: 1,253,916 linear feet per twelve (12) consecutive month period, rolled monthly for EU #1.
2,102,400 linear feet per twelve (12) consecutive month period, rolled monthly for EU #2.

YEAR: _____

| Month | EU #1 Linear Feet | EU #2 Linear Feet | EU #1 Linear Feet | EU #2 Linear Feet | EU #1 Linear Feet | EU #2 Linear Feet |
|-------|-------------------------|-------------------------|-----------------------|-----------------------|----------------------|----------------------|
| | This Month | This Month | Previous 11 Months | Previous 11 Months | 12 Month Total | 12 Month Total |
| | | | | | | |
| | | | | | | |
| | | | | | | |

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Air and Land Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Twelve (12) electric arc stick welders, EU #9
Parameter: Rods
Limit: Fifty (50) tons total per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | Rods (tons) | Rods (tons) | Rods (tons) |
|-------|-------------|--------------------|----------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Air and Land Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Twelve (12) submerged arc welding heads, EU #17
Parameter: Wire
Limit: One hundred and thirty (130) tons total per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | Wire (tons) | Wire (tons) | Wire (tons) |
|-------|-------------|--------------------|----------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Air and Land Pollution Control

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Two (2) plate sweep grinders, EU #11
Parameter: Area of steel plates swept
Limit: 136,817 square feet of steel plates swept per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | Steel Plates Swept (tons) | Steel Plates Swept (tons) | Steel Plates Swept (tons) |
|-------|---------------------------|---------------------------|---------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Air and Land Pollution Control

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Two (2) slab grinders, EU #11
Parameter: Tons of steel slabs
Limit: 68,281 tons of steel slabs ground per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | Steel Slabs Ground (tons) | Steel Slabs Ground (tons) | Steel Slabs Ground (tons) |
|-------|---------------------------|---------------------------|---------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Air and Land Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #20
Parameter: Paint and Solvent Usage
Limit: Not to exceed 17,170 gallons of paint and 876 gallons of solvent per twelve (12) consecutive month period, rolled monthly.

YEAR:

| Month | Paint Gallons | Solvent Gallons | Paint Gallons | Solvent Gallons | Paint Gallons | Solvent Gallons |
|-------|---------------|-----------------|--------------------|-----------------|----------------|-----------------|
| | This Month | | Previous 11 Months | | 12 Month Total | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Air and Land Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Forty-seven (47) torches (excluding the two (2) DB torches), EU #13
Parameter: Inches of one (1) inch steel cut
Limit: 34,601,227 inches total per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | Inches of one (1) inch steel cut | Inches of one (1) inch steel cut | Inches of one (1) inch steel cut |
|-------|-------------------------------------|-------------------------------------|-------------------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Air and Land Pollution Control

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: One (1) armor painting area, EU #10 and four (4) parts washers, EU #12
Parameter: VOC including coatings, dilution solvents delivered to the applicators, and cleaning solvents plus VOC usage in the parts washers
Limit: Less than four and one-half (4.5) tons per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | VOC (tons) | VOC (tons) | VOC (tons) |
|-------|------------|--------------------|----------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Air and Land Pollution Control

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

| Compliance Monitoring Requirement (eg. Permit Condition D.1.3) | Number of Deviations | Date of each Deviation |
|--|-----------------------------|-------------------------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and Gary Air and Land Pollution Control**

**Technical Support Document (TSD) for a Significant Permit Revision to a
Federally Enforceable State Operating Permit**

Source Background and Description

| | |
|---|--|
| Source Name: | Industrial Steel Construction, Inc. |
| Source Location: | 86 North Bridge Street, Gary, Indiana 46404 |
| County: | Lake |
| SIC Code: | 3441/3449 |
| Operation Permit No.: | F 089-5330-00161 |
| Operation Permit Issuance Date: | July 6, 2000 |
| Significant Permit Revision No.: | SPR 089-14370-00161 |
| Permit Reviewer: | Mark L. Kramer |

The Office of Air Quality (OAQ) has reviewed a significant permit revision application from Industrial Steel Construction, Inc. relating to the construction and operation of the following emission units and pollution control devices:

- (a) One (1) paint booth, known as EU#20, equipped with HVLP applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, known as RTO 100, rated at 1.5 million British thermal units per hour, to be installed in 2001, exhausted through Stack #10, capacity: 43,269 pounds of steel plate per hour, limited to 17,170 gallons of paint and 876 gallons of solvents per twelve (12) consecutive month period, rolled monthly.
- (b) One (1) mechanical blaster/blowoff, known as EU#19, equipped with a baghouse, exhausting through Stack #9, to be installed in 2001, capacity: 52,409 pounds of steel plate per hour.
- (c) One (1) natural gas-fired cure oven, rated at 1.4 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001 (deemed an insignificant activity).
- (d) One (1) natural gas-fired preheat oven, rated at 2.58 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001 (deemed an insignificant activity).

History

On May 10, 2001, Industrial Steel Construction, Inc. submitted an application to the OAQ requesting to add a paint line with a regenerative thermal oxidizer, a blaster and two (2) ovens to their existing plant. Industrial Steel Construction, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) on July 5, 2000.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

| Stack ID | Operation | Height (feet) | Diameter (feet) | Flow Rate (acfm) | Temperature (EF) |
|----------|-----------|------------------|--------------------|---------------------|---------------------|
| #9 | Blaster | 30.0 | 2.0 | 22,000 | 68 |
| #10 | RTO | 30.0 | 3.0 | 70,000 | 700 |

Recommendation

The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 10, 2001. Additional information was received on August 7 and 17, 2001.

Emission Calculations

See pages 1 - 6 of 6 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|------------------|----------------------------------|
| PM | 290 |
| PM ₁₀ | 290 |
| SO ₂ | 0.014 |
| VOC | 49.5 |
| CO | 2.02 |
| NO _x | 2.40 |

| HAPs | Potential To Emit (tons/year) |
|---------------------|----------------------------------|
| Benzene | 0.00005 |
| Dichlorobenzene | 0.00003 |
| Formaldehyde | 0.002 |
| Hexane | 0.043 |
| Toluene | 0.00008 |
| Lead Compounds | 0.00001 |
| Cadmium Compounds | 0.00003 |
| Chromium Compounds | 0.00003 |
| Manganese Compounds | 0.000009 |
| Nickel Compounds | 0.00005 |
| Methanol | 16.0 |
| Ethyl benzene | 0.304 |
| Xylenes | 1.52 |
| TOTAL | 17.9 |

Justification for Revision

The FESOP is being revised through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(1) since the potential to emit VOC and PM₁₀ from this revision are greater than twenty five (25) tons per year.

County Attainment Status

The source is located in Lake County.

| Pollutant | Status |
|------------------|----------------------|
| PM ₁₀ | nonattainment |
| SO ₂ | nonattainment |
| NO ₂ | nonattainment |
| Ozone | severe nonattainment |
| CO | attainment |
| Lead | attainment |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. However, for Lake County, NO_x emissions are not included when evaluating the rule applicability relating to ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

- (b) Lake County has been classified as nonattainment for PM₁₀ and SO₂. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Lake County has been classified as attainment or unclassifiable for CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (d) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant | Emissions (tons/year) |
|------------------|--------------------------|
| PM | 97.8 |
| PM ₁₀ | 98.2 |
| SO ₂ | 0.043 |
| VOC | less than 25 |
| CO | 6.03 |
| NO _x | 7.18 |

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories, because no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or more, and because no severe nonattainment pollutant is emitted at rate of twenty-five (25) tons per year or more.
- (b) These emissions are based upon the Technical Support Document for F 089-5330

Revised Potential to Emit of Existing Source Plus Proposed Revision After Issuance

The following table was abstracted from the Technical Support Document for the FESOP (F 089-5330-00161) and shows the revision in the potential to emit of the existing significant emission units after controls as well as the addition of the proposed facilities using bold for additions and strikeouts for deletions.

| | Limited Potential to Emit (tons/year) | | | | | | |
|--|---|--|----------------------------------|--|--------------------------------|--------------------------------|-------------------------|
| Emission Unit | PM | PM₁₀ | SO₂ | VOC | CO | NO_x | HAPs |
| EU #1 | 5.00 | 5.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| EU #2 | 3.44 | 3.44 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| EU #9 | 0.920 | 0.920 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| EU #11 | 42.1 40.0 | 42.1 40.0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| EU #13 | 2.01 | 2.01 | 0.00 | 0.00 | 0.00 | 0.00 | single<10 total < 25 |
| EU #15 | 22.1 less than 17.4 | 22.1 less than 17.4 | 0.00 | <19.0 less than 15.0 | 0.00 | 0.00 | single<10 total < 25 |
| EU #17 | 4.68 | 4.68 | 0.00 | 0.00 | 0.00 | 0.00 | single<10 total < 25 |
| EU #18 | 14.1 | 14.1 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| EU #19 | 5.70 | 5.70 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| EU #20 | 2.66 | 2.66 | 0.00 | 3.86 | 0.00 | 0.00 | 0.893 |
| Insignificant Activities (Natural Gas Combustion) | 0.046 | 0.182 | 0.014 | 0.132 | 2.02 | 2.40 | 0.045 |
| EU #7 (Insignificant Activity) | 0.014 | 0.057 | 0.005 | 0.041 | 0.631 | 0.751 | single<10 total < 25 |
| EU #8 (Insignificant Activity) | 0.113 | 0.450 | 0.036 | 0.326 | 4.98 | 5.92 | single<10 total < 25 |
| EU #10 (Insignificant Activity) | 0.00 | 0.00 | 0.00 | 1.50 | 0.00 | 0.00 | 0.00 |
| EU #12 (Insignificant Activity) | 0.00 | 0.00 | 0.00 | 3.00 | 0.00 | 0.00 | single<10 total < 25 |
| EU #14 (Insignificant Activity) | 0.010 | 0.038 | 0.003 | 0.028 | 0.420 | 0.501 | single<10 total < 25 |
| Other Insignificant Activities | 3.34 | 3.34 | 0.00 | 1.00 | 0.00 | 0.00 | single<10 total < 25 |
| Total Emissions | 97.8 less than 99.4 | 98.2 less than 100 | 0.043 0.058 | less than 25 | 6.03 8.05 | 7.18 9.58 | single<10 total < 25 |

Note: (a) The VOC emissions from EU #20 after controls were 2.47 tons per year which has been increased to 3.86 tons per year, the balance of the total VOC emissions, so that the entire source VOC emissions remain less than twenty-five (25) tons per year.

(b) The limited VOC delivered to the applicators, including those from coatings, dilution solvents, and cleaning solvents, from the one (1) paint booth, identified as EU #15, have been revised from less than nineteen (19) tons to less than fifteen (15) tons per twelve (12) consecutive month period, rolled monthly, and

The use less than **7,801** ~~9,884~~ gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, rolled monthly, **equivalent to PM and PM₁₀ emissions of 17.4 tons per year.**

(c) The limited PM and PM₁₀ emissions from EU #11 have been proportionately reduced by 40/42.1 so that the total PM and PM₁₀ limited emissions are 40.0 tons per year. The limits in Condition D.1.1(e) and (f) will be revised as follows:

(1) The input of steel plates to the two (2) plate sweep grinders, identified as EU #11, shall be limited to **136,817** ~~144,000~~ square feet of steel plates per twelve (12) consecutive month period, rolled monthly, **equivalent to 6.32 tons per year.**

(2) The input of steel slabs to the two (2) slab grinders, identified as EU #11, shall be limited to **68,281** ~~74,866~~ tons of steel slabs per twelve (12) consecutive month period, rolled monthly, **equivalent to 33.6 tons per year.**

Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. Note the existing limits for PM₁₀ and VOC have been decreased to accommodate the increases from the proposed revision and allow the source to retain its FESOP and minor source status pursuant to 326 IAC 2-8 and 326 IAC 2-3. The control equipment is considered federally enforceable only after issuance of this FESOP revision.

| | Potential to Emit (tons/year) | | | | | | |
|-------------------------------|----------------------------------|------------------|-----------------|--------------|------|-----------------|---|
| Process/facility | PM | PM ₁₀ | SO ₂ | VOC | CO | NO _x | HAPs |
| Proposed Revision | 8.41 | 8.54 | 0.014 | 3.99 | 2.02 | 2.40 | 0.938 |
| Revised Existing Source | less than 91.0 | less than 91.46 | 0.043 | 20.9 | 6.03 | 7.18 | single less than 10 total less than 25 |
| PSD or Offset Threshold Level | 100 | 100 | 100 | less than 25 | 100 | 40 | single less than 10 total less than 25 |

This revision to an existing minor stationary source is not major because the emission increases are less than the PSD and Emission Offset threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements as well as pursuant to 326 IAC 2-3, the Emission Offset requirements, do not apply.

This revision to the existing FESOP will **not** change the status of the stationary source because the emissions from the entire source will still be limited to less than the Part 70 major source thresholds.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed revision.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this proposed revision.

State Rule Applicability - Individual Facilities

326 IAC 2-3 (Emission Offset)

This stationary source is not major because the potential to emit after controls and limits are still less than the Emission Offset threshold levels of one hundred (100) tons per year for PM, PM₁₀ and SO₂ and less than twenty-five (25) tons per year for VOC and less than forty (40) tons per year for NO_x. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

In order to render the requirements of 326 IAC 2-3, the source has agreed to the following throughput limits:

- (a) The two (2) plate sweep grinders, identified as EU #11, are limited to 136,817 square feet of steel plates per twelve (12) consecutive month period, rolled monthly.
- (b) The two (2) slab grinders, identified as EU #11, are limited to 68,281 tons of steel slabs per twelve (12) consecutive month period, rolled monthly.
- (c) The one (1) paint booth, identified as EU #15, is limited to less than fifteen (15) tons of VOC delivered to the applicators per twelve (12) consecutive month period, rolled monthly and 7,801 gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, rolled monthly.
- (d) The one (1) paint booth, identified as EU #20, is limited to 17,170 gallons per twelve (12) consecutive month period, rolled monthly of primer delivered to the applicators with a VOC content of no more than 21.6 pounds per gallon of solids and no more than 876 gallons of solvent per twelve (12) consecutive month period, rolled monthly with a VOC content of no more than 6.93 pounds per gallon.

326 IAC 6-1 (Nonattainment Area Limitations)

Pursuant to 326 IAC 6-1-1, the source located in Lake County, which is a listed county in 326 IAC 6-1-7 and has actual PM emission over ten (10) tons per year shall comply with limitations in 326 IAC 6-1-2. The non-fugitive facilities shall meet the allowable PM emission limitation pursuant to 326 IAC 6-1-2 (a) of 0.03 grains per standard dry cubic feet per minute.

- (a) Shot Blaster

The proposed one (1) blaster (EU #19), equipped with baghouse, complies with 0.03 grains per dry standard cubic foot of outlet air, since the stated grain loading is 0.0069 grains per dry standard cubic feet per minute.

(b) Paint Booth

The proposed paint booth, equipped with dry filters complies with 0.03 grains per dry standard cubic foot of outlet air, since the potential PM emissions after control are 2.66 tons per year, equivalent to 0.607 pounds per hour, at a flow rate of 22,000 actual cubic feet per minute (10,052 dry standard cubic feet per minute) is equivalent to 0.007 grains per dry standard cubic feet per minute which complies with the allowable PM emission rate of 0.03 grains per dry standard cubic feet per minute.

326 IAC 7-1.1 (Sulfur dioxide emission limitations)

Since the potential-to-emit sulfur dioxide from the RTO, cure oven and preheat oven combined is less than twenty-five (25) tons per year or more of SO₂, this rule is not applicable to any facilities.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator in EU #20 paint booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water for extreme performance coatings. In order to comply with this rule, the source has proposed installing a regenerative thermal oxidizer, known as RTO 100, which must be operated at all times this proposed paint booth is in operation.

The primer coating for the paint booth, EU #20, has a maximum VOC content of 5.40 pounds per gallon less water complies as follows:

The minimum overall control efficiency of the oxidizer has been calculated as follows as described in 326 IAC 8-1-2(c).

$E = L/[1-(L/D)]$, where

E = emission limit in pounds per gallon of solids

L = 3.5 pounds of VOC per gallon less water

D = density of VOC in coating, 7.36 pounds per gallon

A solvent density of seven and thirty-six hundredths (7.36) pounds of VOC per gallon of coating shall be used to determine equivalent pounds of VOC per gallon of solids for the applicable emission limit contained in this article.

$$E = 3.5/[1-(3.5/7.36)] = 6.67 \text{ pounds per gallon of solid}$$

$O = [(V-E)/V] \times 100$, where

O = overall control efficiency required for compliance in percent

E = 6.67 pounds per gallons of solids

V = VOC content of organic coating in pounds per gallon solids solids as-applied (21.6 pounds VOC per gallon of solids as shown on page 1 of 6 of Appendix A)

$$O = [(21.6 - 6.67)/21.6] \times 100 = 69.1\%$$

Since the overall control efficiency for the regenerative thermal oxidizer, known as RTO 100, is 95%, this paint booth with an RTO complies with the rule.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and the use of the oxidizer the coating booth is in compliance with this requirement. This statement of compliance assumes that the source has submitted proof that this formulation data (e.g., MSDS) is consistent with Method 24. The source must do this before compliance can be determined.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The source is subject to the requirement of 326 IAC 8-7 since the potential to-emit VOC from the source exceed ten (10) tons per year in Lake County. Pursuant to 326 IAC 8-7-1(b), since all surface coating at the source is subject to 326 IAC 8-2-9 (Surface coating emission limitations: miscellaneous metal coating operations), and 326 IAC 8-2 is listed as 326 IAC 8-7-1(a)(1)(A), the source is exempt from the specific VOC reduction requirements of 326 IAC 8-7-3 and subsequent sections of 326 IAC 8-7.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The mechanical blaster/blowoff, known as EU#19, equipped with a baghouse, exhausting through Stack #9, has applicable compliance monitoring conditions as specified below:
 - (1) Visible emissions notations of the mechanical blaster/blowoff stack exhaust #9 shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (2) The Permittee shall record the total static pressure drop across the baghouse controlling the mechanical blaster/blowoff, at least once per shift when the mechanical

blaster/blowoff is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 to 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

- (3) An inspection shall be performed each calendar quarter of all bags controlling the operations at this source when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.
- (4) In the event that bag failure has been observed:
 - (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.
 - (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

These monitoring conditions are necessary because the baghouse for the blaster must operate properly to ensure compliance with 326 IAC 6-1, 326 IAC 2-3 and 326 IAC 2-8 (FESOP).

- (b) The paint booth, known as EU#20, equipped with HVLP applicators and dry filters for PM overspray, equipped with natural gas-fired regenerative thermal oxidizer, known as RTO 100, exhausted through Stack #10 has applicable compliance monitoring conditions as specified below:
 - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters for paint booth, EU #20. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the paint booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
 - (2) Monthly inspections shall be performed of the coating emissions from the paint booth, known as EU#20, equipped with natural gas-fired regenerative thermal oxidizer, known as RTO 100, known as Stack #10, for the presence of overspray

on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (3) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (4) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range established in the most recent compliant stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (5) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters and the RTO for the paint booth, EU #20, must operate properly to ensure compliance with 326 IAC 6-1, 326 IAC 8-2-9, 326 IAC 2-3 and 326 IAC 2-8 (FESOP).

Testing Requirements

PM and PM₁₀ testing of the shot blaster is required to show compliance with 326 IAC 6-1 and 326 IAC 2-3 and 326 IAC 2-8-4. In addition, stack testing of the overall VOC control (capture and destruction) efficiency of the RTO is required to show compliance with 326 IAC 8-2-9, 326 IAC 2-3 and 326 IAC 2-8-4.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

Entire Permit:

- (a) On January 1, 2001, the name of the Office of Air Management (OAM) was changed to the Office of Air Quality (OAQ). All references to the Office of Air Management or OAM on the cover page of the permit have been changed to Office of Air Quality or OAQ. All references to Office of Air Management or OAM in the Part 70 should be read as Office of Air Quality or OAQ.

- (b) In addition, all references to the Compliance Data Section have been changed to Compliance Branch.
- (c) All references to the Gary Division of Air Pollution Control have been changed to Gary Air and Land Pollution Control

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

The stationary source consists of the following emission units and pollution control devices:

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

- (b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, ~~limited to less than 19 tons of VOC delivered to the applicators per year~~, limited to less than ~~15~~ **19** tons of VOC delivered to the applicators per twelve (12) consecutive month period, rolled monthly and limited to less than ~~7,801~~ **9,884** gallons of paint with a density 21.3 pounds per gallon twelve (12) consecutive month period, rolled monthly.
- (d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.
- (e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.
- (g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12)

consecutive month period, rolled monthly.

Grinding

- (h) Two (2) plate sweep grinders, identified as EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to **136,817** ~~144,000~~ square feet of steel plates per twelve (12) consecutive month period, rolled monthly.
- (i) Two (2) slab grinders, identified as EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to **68,281** ~~74,866~~ tons of steel slabs per twelve (12) consecutive month period, rolled monthly.

Paint Line

- (j) **One (1) paint booth, known as EU#20, equipped with HVLP applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, known as RTO 100, rated at 1.5 million British thermal units per hour, to be installed in 2001, exhausted through Stack #10, capacity: 43,269 pounds of steel plate per hour, limited to 17,170 gallons of paint and 876 gallons of solvents per twelve (12) consecutive month period, rolled monthly.**
- (k) **One (1) mechanical blaster/blowoff, known as EU#19, equipped with a baghouse, exhausting through Stack #9, to be installed in 2001, capacity: 52,409 pounds of steel plate per hour.**

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:
 - (1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7.
 - (2) Twenty-one (21) space heaters, identified as EU #8, rated at 2.1 million British thermal units per hour total.
 - (3) Twelve (12) down-flow heaters, identified as EU #8, rated at 0.600 million British thermal units per hour each or 7.2 million British thermal units per hour total.
 - (4) Twenty-eight (28) radiant heaters, identified as EU #8, rated at 0.175 million British thermal units per hour each or 4.9 million British thermal units per hour total.
 - (5) Four (4) preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total.
 - (6) **One (1) natural gas-fired cure oven, rated at 1.4 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001.**
 - (7) **One (1) natural gas-fired preheat oven, rated at 2.58 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001.**

Condition B.10, Compliance with Permit Conditions, has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the Permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the Permittee's application to renew the permit as follows:

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, ~~except those specifically designated as not federally enforceable~~, is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) **An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.**

A typographical error has been corrected in Condition B.11(a) as follows:

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Conveyor Line, Building A Line, Girder Shop & Grinding

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

- (b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, ~~limited to less than 19 tons of VOC delivered to the applicators per year,~~ limited to less than **15 49** tons of VOC delivered to the applicators per twelve (12) consecutive month period, rolled monthly and limited to less than **7,801 9,884** gallons of paint with a density 21.3 pounds per gallon twelve (12) consecutive month period, rolled monthly.
- (d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.
- (e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.
- (g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

Grinding

- (h) Two (2) plate sweep grinders, identified as EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to **136,817 144,000** square feet of steel plates per twelve (12) consecutive month period, rolled monthly.

Facility Description [326 IAC 2-8-4(10)]: Conveyor Line, Building A Line, Girder Shop & Grinding Continued

Grinding

- (i) Two (2) slab grinders, identified as EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to **68,281** ~~74,866~~ tons of steel slabs per twelve (12) consecutive month period, rolled monthly.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Emission Offset Minor Limit [326 IAC 2-3]

- (a) The one (1) paint booth, identified as EU #15, shall:
- (1) Use less than **fifteen (15)** ~~nineteen (19)~~ tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the source's potential to emit VOC to less than twenty-five (25) per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
 - (2) Use less than **7,801** ~~9,884~~ gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (b) The input of steel plates and shapes to the mechanical blaster, identified as EU #1 shall be limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (c) The input of steel plates and shapes to the mechanical blaster, identified as EU #2 shall be limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (d) The input of rods to the twelve (12) electric arc stick welders, identified as EU #9 shall be limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

- (e) The input of steel plates to the two (2) plate sweep grinders, identified as EU #11, shall be limited to **136,817** ~~144,000~~ square feet of steel plates per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (f) The input of steel slabs to the two (2) slab grinders, identified as EU #11, shall be limited to **68,281** ~~71,866~~ tons of steel slabs per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- ~~(g) The input of steel slabs to the two (2) slab grinders, identified as EU #11, shall be limited to 71,866 tons of steel slabs per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.~~
- (gh) The throughput of steel to the forty-seven (47) torches, (excluding the two (2) DB torches) identified as EU #13, shall be limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.
- (hi) The input of wire to the twelve (12) submerged arc welding heads, identified as EU #17 shall be limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM₁₀ from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Paint Booth, known as EU#20

- (j) One (1) paint booth, known as EU#20, equipped with HVLP applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, known as RTO 100, rated at 1.5 million British thermal units per hour, to be installed in 2001, exhausted through Stack #10, capacity: 43,269 pounds of steel plate per hour, limited to 17,170 gallons of paint and 876 gallons of solvents per twelve (12) consecutive month period, rolled monthly.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-1-2] [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or

products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to HVLP paint applicators.

- (b) Based upon 326 IAC 8-1-2(c) and a minimum overall control efficiency of 69.1% (the overall control efficiency equals: (capture efficiency) x (destruction efficiency)), the VOC content of the coating shall not exceed 21.6 pounds per gallon of coating solids delivered to the applicator.
- (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.2 Emission Offset Minor Limit [326 IAC 2-3]

- (a) The coatings used in the one (1) paint booth, identified as EU #20, shall not exceed 17,170 gallons of primer delivered to the applicators with a VOC content of no more than 21.6 pounds per gallon of solids per twelve (12) consecutive month period, rolled monthly.
- (b) The solvents used in the one (1) paint booth, identified as EU #20, shall not exceed 876 gallons of solvent with a VOC content of no more than 6.93 pounds per gallon per twelve (12) consecutive month period, rolled monthly.
- (c) Compliance with these limits, equivalent to 3.86 tons of VOC per year, makes the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

D.2.3 Regenerative Thermal Oxidizer

- (a) The regenerative thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1400EF during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM.
- (b) When operating the thermal oxidizer to achieve compliance with 326 IAC 8-2-9, 3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum overall control efficiency of 69.1%. These efficiencies and the use of the thermal oxidizer are required by rule 326 IAC 8-1-2(a)(2).

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

During the period between 60 and 180 days after the paint booth, EU #20, is in operation, the Permittee shall perform VOC testing to demonstrate compliance with Condition D.2.1 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.7 Parametric Monitoring

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.
- (b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range established in the most recent compliant stack test.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, D.2.2, D.2.3 and D.2.7, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2 and D.2.3 as well as the parametric monitoring requirements of Condition D.2.7.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
 - (6) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent

compliance stack test.

(7) Weekly records of the duct pressure or fan amperage.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Blaster/blowoff, known as EU#19

(k) One (1) mechanical blaster/blowoff, known as EU#19, equipped with a baghouse, exhausting through Stack #9, to be installed in 2001, capacity: 52,409 pounds of steel plate per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the mechanical blaster/blowoff, known as EU#19, shall not exceed 0.03 grain per dry standard cubic foot for Stack #9, equivalent to 5.66 pounds per hour at a flow rate of 22,000 dry standard cubic feet per minute.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Particulate Matter (PM)

In order to comply with Condition D.3.1, the baghouse for PM control shall be in operation and control emissions from the mechanical blaster/blowoff, known as EU#19, at all times that the mechanical blaster/blowoff is in operation.

D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between 60 and 180 days after the mechanical blaster/blowoff is in operation, in order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM and PM₁₀ testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accord-

ance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.5 Visible Emissions Notations

- (a) Visible emission notations of the mechanical blaster/blowoff stack exhaust #9 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the mechanical blaster/blowoff process, at least once per shift when the mechanical blaster/blowoff process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the mechanical blaster/blowoff operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.3.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations once per shift of the mechanical blaster/blowoff stack exhaust #9.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:
 - (1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle operation.
 - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.3.7, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7 and the dates the vents are redirected.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Section D.2 has been renumbered as Section D.4 and all conditions have subsequently been renumbered with the cross-references also renumbered.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR **QUALITY** MANAGEMENT
COMPLIANCE **BRANCH DATA** SECTION
and Gary Division of Air and Land Pollution Control

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #15
Parameter: VOC including coatings, dilution solvents delivered to the applicators, and cleaning solvents
Limit: Less than **fifteen (15)** ~~nineteen (19)~~ tons per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | VOC (tons) | VOC (tons) | VOC (tons) |
|-------|------------|--------------------|----------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR **QUALITY** MANAGEMENT
COMPLIANCE **BRANCH DATA** SECTION
and Gary ~~Division of Air~~ and Land Pollution Control

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #15
Parameter: Gallons of paint with a density of 21.3 pounds per gallon
Limit: Less than **7,801** ~~9,884~~ gallons per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | Gallons of Paint | Gallons of Paint | Gallons of Paint |
|-------|------------------|--------------------|------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR **QUALITY** MANAGEMENT
COMPLIANCE **BRANCH** DATA SECTION
and Gary Division of Air and Land Pollution Control

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Two (2) plate sweep grinders, EU #11
Parameter: Area of steel plates swept
Limit: **136,817** ~~144,000~~ square feet of steel plates swept per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | Steel Plates Swept (tons) | Steel Plates Swept (tons) | Steel Plates Swept (tons) |
|-------|---------------------------|---------------------------|---------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR **QUALITY** MANAGEMENT
COMPLIANCE **BRANCH** DATA SECTION
and Gary Division of Air and Land Pollution Control

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: Two (2) slab grinders, EU #11
Parameter: Tons of steel slabs
Limit: **68,281** ~~71,866~~ tons of steel slabs ground per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | Steel Slabs Ground (tons) | Steel Slabs Ground (tons) | Steel Slabs Ground (tons) |
|-------|---------------------------|---------------------------|---------------------------|
| | This Month | Previous 11 Months | 12 Month Total |
| | | | |
| | | | |
| | | | |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
and Gary Air and Land Pollution Control**

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #20
Parameter: Paint and Solvent Usage
Limit: Not to exceed 17,170 gallons of paint and 876 gallons of solvent per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

| Month | Paint Gallons | Solvent Gallons | Paint Gallons | Solvent Gallons | Paint Gallons | Solvent Gallons |
|-------|---------------|-----------------|--------------------|-----------------|----------------|-----------------|
| | This Month | | Previous 11 Months | | 12 Month Total | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

9 **No deviation occurred in this month.**

9 **Deviation/s occurred in this month.**
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Conclusion

The construction of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 089-14370-00161.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Page 1 of 6 TSD App A

**Company Name: Industrial Steel Construction, Inc.
Address City IN Zip: 86 North Bridge Street, Gary, Indiana 46404
FESOP Revision: 089-14370
Plt ID: 089-00161
Reviewer: Mark L. Kramer
Date: May 10, 2001**

| Material | Density (lbs/gal) | Weight % Volatile (H2O & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (units/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC (pounds per hour) | Potential VOC (pounds per day) | Potential VOC (tons per year) | Particulate Potential (tons/yr) | lbs VOC/gal solids | Transfer Efficiency |
|---|----------------------|--|-------------------|----------------------|-------------------|---------------------------------------|---------------------------|-------------------------|---|-------------------------------------|---------------------------------------|-----------------------------------|----------------------------------|------------------------------------|-----------------------|------------------------|
| GTA 840 Cleaner | 6.93 | 100.00% | 0.0% | 100.0% | 0.0% | 0.00% | 0.10000 | 1.000 | 6.93 | 6.93 | 0.69 | 16.63 | 3.04 | 0.00 | n/a | 100% |
| #997 Nippe Ceramo Primer | 7.47 | 72.30% | 0.0% | 72.3% | 0.0% | 25.00% | 1.96000 | 1.000 | 5.40 | 5.40 | 10.59 | 254.05 | 46.36 | 4.44 | 21.60 | 75% |
| State Potential Emissions | | | | | | | | | PM | Control Efficiency | 40.00% | | | | | |
| METHODOLOGY | | | | | | | | | VOC | Control Efficiency | 95.00% | | | | | |
| Add worst case coating to all solvents | | | | | | | | | Uncontrolled | | 11.28 | 270.69 | 49.40 | 4.44 | | |
| | | | | | | | | | Controlled | | 0.56 | 13.53 | 2.47 | 2.66 | | |

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Page 2 of 6 TSD AppA

Company Name: Industrial Steel Construction, Inc.
Address City IN Zip: 86 North Bridge Street, Gary, Indiana 46404
FESOP Revision: 089-14370
Plt ID: 089-00161
Reviewer: Mark L. Kramer
Date: May 10, 2001

Control Efficiency **95.00%**

| Material | Density (lbs/gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Methanol | Weight % Ethyl Benzene | Weight % Xylene | | | | | Methanol Emissions (tons/yr) | Ethyl Benzene Emissions (tons/yr) | Xylene Emissions (tons/yr) | Total HAPs (tons/yr) |
|--------------------------|----------------------|--------------------------------------|------------------------|----------------------|---------------------------|--------------------|--|--|--|--|------------------------------------|---|----------------------------------|-------------------------|
| GTA 840 Cleaner | 6.93 | 0.10000 | 1.000 | 0.00% | 10.00% | 50.00% | | | | | 0.000 | 0.304 | 1.52 | |
| #997 Nippe Ceramo Primer | 7.47 | 1.96000 | 1.000 | 25.00% | 0.00% | 0.00% | | | | | 16.03 | 0.00 | 0.00 | |
| Individual Total | | | | | | | | | | | 16.0 | 0.304 | 1.518 | 17.853 |
| Controlled | | | | | | | | | | | 0.802 | 0.015 | 0.076 | 0.893 |

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Baghouse Operations**

Page 3 of 6 TSD App A

Company Name: Industrial Steel Construction, Inc.
Address City IN Zip: 86 North Bridge Street, Gary, Indiana 46404
FESOP Revision: 089-14370
Plt ID: 089-00161
Reviewer: Mark L. Kramer
Date: May 10, 2001

| Unit ID | Control Efficiency (%) | Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.) | Gas or Air Flow Rate (acfm.) | Emission Rate before Controls (lb/hr) | Emission Rate before Controls (tons/yr) | Emission Rate after Controls (lb/hr) | Emission Rate after Controls (tons/yr) |
|---------|------------------------|---|------------------------------|---------------------------------------|---|--------------------------------------|--|
| EU#19 | 98.0% | 0.0069 | 22000.0 | 65.1 | 285 | 1.301 | 5.70 |
| EU#19 | 98.0% | 0.0300 | 22000.0 | 282.9 | 1239 | 5.657 | 24.78 |

Allowable

Pursuant to 326 IAC 6-1

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Page 4 of 6 TSD App A

Company Name: Industrial Steel Construction, Inc.
Address City IN Zip: 86 North Bridge Street, Gary, Indiana 46404
FESOP Revision: 089-14370
Pit ID: 089-00161
Reviewer: Mark L. Kramer
Date: May 10, 2001

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

Combustion
Unit **Rating (mmBtu/hr)**
RTO **1.50**
Pre-heat Oven **2.58**
Cure Oven **1.40**

5.48

48.00

| | Pollutant | | | | | |
|-------------------------------|----------------------------|-------|-------|-------------|-------|------|
| | PM* | PM10* | SO2 | NOx | VOC | CO |
| | Emission Factor in lb/MMCF | | | | | |
| | 1.9 | 7.6 | 0.6 | 100.0 | 5.5 | 84.0 |
| | | | | **see below | | |
| Potential Emission in tons/yr | 0.046 | 0.182 | 0.014 | 2.40 | 0.132 | 2.02 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Page 5 of 6 TSD App A

HAPs Emissions

Company Name: Industrial Steel Construction, Inc.
Address City IN Zip: 86 North Bridge Street, Gary, Indiana 46404
FESOP Revision: 089-14370
Plt ID: 089-00161
Reviewer: Mark L. Kramer

HAPs - Organics

| | | | | | |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Emission Factor in lb/MMcf | Benzene 2.1E-03 | Dichlorobenzene 1.2E-03 | Formaldehyde 7.5E-02 | Hexane 1.8E+00 | Toluene 3.4E-03 |
| Potential Emission in tons/yr | 5.041E-05 | 2.880E-05 | 1.800E-03 | 4.320E-02 | 8.161E-05 |

HAPs - Metals

| | | | | | | |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|---------------|
| Emission Factor in lb/MMcf | Lead 5.0E-04 | Cadmium 1.1E-03 | Chromium 1.4E-03 | Manganese 3.8E-04 | Nickel 2.1E-03 | Total HAPs |
| Potential Emission in tons/yr | 1.200E-05 | 2.640E-05 | 3.360E-05 | 9.121E-06 | 5.041E-05 | 0.045 |

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Summary of Emissions Calculations

Page 6 of 6 TSD AppA

Company Name: Industrial Steel Construction, Inc.
 Address City IN Zip: 86 North Bridge Street, Gary, Indiana 46404
 FESOP Revision: 089-14370
 Plt ID: 089-00161
 Reviewer: Mark L. Kramer
 Date: May 10, 2001

Before Controls

| Emission Unit | Pollutant | | tons/yr | | | | |
|------------------------------|-----------|-------|---------|------|-------|------|--------|
| | PM | PM-10 | SO2 | NOx | VOC | CO | HAPs |
| Natural Gas Combustion | | | | | | | |
| RTO, Pre-heat and Cure Ovens | 0.046 | 0.182 | 0.014 | 2.40 | 0.132 | 2.02 | 0.045 |
| Spray Booth | 4.44 | 4.44 | 0.00 | 0.00 | 49.4 | 0.00 | 17.90 |
| Blaster | 285 | 285 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total | 289.5 | 289.6 | 0.014 | 2.40 | 49.53 | 2.02 | 17.945 |

After Controls

| Emission Unit | Pollutant | | tons/yr | | | | |
|------------------------------|-----------|-------|---------|------|-------|------|-------|
| | PM | PM-10 | SO2 | NOx | VOC | CO | HAPs |
| Natural Gas Combustion | | | | | | | |
| RTO, Pre-heat and Cure Ovens | 0.046 | 0.182 | 0.014 | 2.40 | 0.132 | 2.02 | 0.045 |
| Spray Booth | 2.66 | 2.66 | 0.00 | 0.00 | 2.47 | 0.00 | 0.893 |
| Blaster | 5.70 | 5.70 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Total | 8.41 | 8.54 | 0.014 | 2.40 | 2.60 | 2.02 | 0.938 |